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ABSTRACT

This report points out that although Follow Through, an experimental program designed to find more effective approaches to teaching young children from low-income families, achieved differences in outcome between Follow Through and non-Follow Through children, problems in its initial design and implementation will limit reaching statistically reliable conclusions as to which approaches are successful. The report recalls the events which led to a reorganization of the national evaluation of Follow Through, and suggests ways to prevent similar happenings. (Author)

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REPORT TO THE CONGRESS

BY THE COMPTROLLER GENERAL OF THE UNITED STATES

Follow Through: Lessons Learned From Its Evaluation And Need To Improve Its Administration

Office of Education

Department of Health, Education, and Welfare

This report points out that although Follow Through, an experimental program designed to find more effective approaches to teaching young children from low-income families, achieved differences in outcome between Follow Through and non-Follow-Through children, problems in its initial design and implementation will limit reaching statistically reliable conclusions as to which approaches are successful.

The report recalls the events which led to a reorganization of the national evaluation of Follow Through and suggests ways to prevent similar happenings.

TM005 070

MWD-75-34

OCT. 7,1975

COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-164031(1)

To the President of the Senate and the
Speaker of the House of Representatives

In this report we assess the Follow Through program and its national evaluation and suggest ways to improve its administration. The program is administered by the Office of Education, Department of Health, Education, and Welfare.

Because Follow Through is the largest educational research and development program ever undertaken, we have tried to determine (1) the results of its efforts in identifying successful approaches to teaching children from low-income families and (2) its accomplishments in providing comprehensive services and in involving parents in program activities.

We made our review pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

We are sending copies of this report to the Director, Office of Management and Budget, and to the Secretary of Health, Education, and Welfare.

Comptroller General
of the United States

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ABBREVIATIONS

GAO	General Accounting Office
HEW	Department of Health, Education, and Welfare
LEA	local educational agency
OE	Office of Education

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

FOLLOW THROUGH: LESSONS LEARNED FROM ITS EVALUATION AND NEED TO IMPROVE ITS ADMINISTRATION
Office of Education
Department of Health, Education, and Welfare

D I G E S T

Follow Through is an experimental program designed to find more effective approaches to teaching young children from low-income families.

Colleges, universities, and private educational research organizations developed model approaches to install in classrooms. The Department of Health, Education, and Welfare's (HEW's) Office of Education contracted for a national evaluation to assess effects of the approaches. (See pp. 1 and 4.)

GAO found problems in the initial design and implementation of Follow Through and a need to improve program and project administration.

Accordingly, GAO recommends that the Secretary of HEW direct the Office of Education to:

--Insure that future experimental programs are not designed apart from evaluation to maximize the degree to which experimental results will be statistically reliable. (See p. 26.)

--Translate problems encountered during the Follow Through experiment into criteria for designing and administering future experiments, including among other things, criteria to prevent collecting massive data on program results before goals and objectives are properly defined. (See p. 26.)

--Establish, to the extent practicable, performance standards for each service component and require local educational agencies to evaluate their progress toward meeting these standards. (See p. 38.)

--Develop and disseminate comprehensive guidance to the agencies on a recordkeeping system, including type of records needed to document performance and provide feedback on program results. (See p. 39.)

--Develop and disseminate specific guidance to local educational agencies and consultants on the information that should be included in reports to the Office of Education and on their format and content. (See p. 39.)

--Develop, in the early implementation stage of future experiments, regulations and guidelines concerning project administration and monitoring. (See p. 39.)

--Provide guidance to local educational agencies on the format of eligibility records and require them to periodically report actual enrollment data. (See p. 49.)

--Document reasons for exempting local educational agencies from program eligibility requirements. (See p. 49.)

HEW agreed with these recommendations. However, GAO believes the action taken by HEW will not fully implement two of its recommendations. (See p. 40.)

Problems and areas needing improvement include:

--Follow Through planners designed a framework for large-scale experimentation and evaluation without first defining specific goals and objectives of the experiment. (See p. 6.)

--Even though initial results from the revised evaluation show that the approaches achieved some differences in outcome between Follow Through and non-Follow-Through children, problems in the experiment's initial design and implementation will limit the Office of Education's ability to reach statistically reliable conclusions as to which approaches are successful. (See pp. 16 and 19.)

--Although the ultimate intention is to disseminate and encourage use of Follow Through approaches that prove successful, the Office of Education has not yet developed appropriate plans to accomplish this. (See pp. 22 and 24.)

--Noninstructional services needed to be increased and made more uniform. (See pp. 27 and 33.)

--The Office of Education has not (1) established performance standards for each service component, (2) provided guidance on the type of records needed to document project performance, or (3) required grantees to formally evaluate their projects. (See pp. 31 and 33.)

--The Office of Education's monitoring reports on Follow Through projects did not specify program weaknesses with their probable causes and corrective actions needed. (See pp. 35 and 36.)

--The Office of Education did not have adequate control over project compliance with eligibility requirements. (See pp. 41, 47, and 48.)

CHAPTER 1

INTRODUCTION

Follow Through is a program for children in kindergarten through the third grade designed primarily to build upon gains made by children from low-income families previously enrolled in Head Start or similar preschool programs.1/ Follow Through was authorized in 1967 under title II of the Economic Opportunity Act of 1964, as amended (42 U.S.C. 2809), as a service program. It uses school, community, and family resources in meeting the educational, physical, psychological, and social needs of children. The program's major emphasis, however, has been on assessing the effectiveness of different approaches for educating young children from low-income families. It is the largest educational research and development program ever undertaken, according to OE.

This report includes information on (1) the design of Follow Through as an experiment and OE's efforts to evaluate the results of the program and disseminate information on successful Follow Through approaches, (2) project administration, including the delivery of noninstructional services and project compliance with funding requirements, and (3) the eligibility characteristics of the children enrolled in the nine projects reviewed.

PROGRAM ADMINISTRATION

In a June 1967 memorandum of understanding, revised in May 1969, the Director, Office of Economic Opportunity, delegated responsibility for administering Follow Through to the Secretary of Health, Education, and Welfare (HEW). The Secretary assigned responsibility for the program to OE, which issued regulations on funding and developed a draft program manual. In March 1974 OE published proposed regulations covering all Follow Through operations. Final regulations were issued on April 21, 1975, and became effective on June 5, 1975.

OE asked State educational agencies and State economic opportunity offices to nominate communities to participate in Follow Through. OE then invited several nominated communities to submit project applications for funds and,

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1/According to the Office of Education (OE), a similar preschool program is one that offers the full range of comprehensive services that Head Start offers; that is, instructional, medical, dental, psychological, nutritional, and social services.

on the basis of these applications, selected communities--primarily local educational agencies (LEAs)--to participate. The LEAs began their projects in the first grade of school (either kindergarten or first grade) and added a new grade each year thereafter through third grade.

OE awards 1-year grants directly to LEAs and requires them to supplement the grants with local funds or noncash contributions. The local, or non-Federal, share ranges from 14 to 25 percent of the amount of the Follow Through grant. At the time of our sitework, LEAs were also required to supplement their grants with a portion of the funds they received under the Federal program of aid to educationally deprived children--title I of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 241a). The title I contribution had to be at least 15 percent of the combined Follow Through and title I funds, except that no LEA was required to contribute more than 10 percent of its total title I allocation to Follow Through.

To receive Federal funds, LEAs are obligated to meet the requirements in the project application, including the grant terms and conditions; the memorandum of understanding; and the draft program manual. Each LEA has a coordinator or director responsible for overall project management in accordance with the above requirements.

The following table, prepared from OE statistics, summarizes Follow Through operations from inception through school year 1973-74.

School year	Federal funds available	Projects	Children enrolled from low-income families (note a)
	(millions)		
1967-68	$ 3.75	39	2,900
1968-69	11.25	103	15,500
1969-70	32.00	161	37,000
1970-71	70.30	178	60,200
1971-72	69.00	178	78,170
1972-73	63.06	173	84,000
1973-74	50.62	170	78,000

a/OE does not collect information on the number of children enrolled from non-low-income families.

FOLLOW THROUGH AS A SERVICE PROGRAM

Head Start, also authorized by the Economic Opportunity Act, is a comprehensive program that provides to preschool poverty children educational, medical, dental, psychological, nutritional, and social services. In addition, each Head Start project promotes parent and community involvement in projects and provides staff training and development. Because early Head Start evaluations indicated that program benefits were soon dissipated if not reinforced in the regular school system, the Congress created Follow Through to sustain and expand the gains of Head Start graduates. Therefore, the program was designed to provide the same kinds of services and activities as Head Start.

The size of Follow Through never reached the proportions intended. An appropriation of $120 million was requested for the first year of the program, and OE envisioned increasingly greater amounts for later years. To accomplish the program's objective, significant funding was considered necessary because, during the fiscal year before creation of Follow Through, Head Start had served about 215,000 children in its full-year program and 466,000 children in its summer program at an annual cost of about $316 million.

The first appropriation for Follow Through was $15 million and was to cover 2 years of operation. Because this amount would serve only a fraction of the eligible preschool children, the program's emphasis was changed during school year 1967-68 from a service program to an experimental program.

FOLLOW THROUGH AS AN EXPERIMENTAL PROGRAM

The purpose of Follow Through as an experimental program, referred to by OE as "planned variation," is to develop and validate different approaches to educating young children from low-income families. To implement the change, OE initially identified 14 approaches for use by LEAs. Starting with school year 1968-69, OE required LEAs entering the program to select and implement 1 of the 14 approaches. LEAs that had entered the program in 1967 were encouraged, but not required, to select one of the approaches.

During school year 1973-74, 22 approaches were being implemented in Follow Through projects throughout the Nation. They generally conformed to one of the following groups: (1) highly structured projects emphasizing academic skills in reading and arithmetic, (2) projects emphasizing emotional-social development and encouraging exploration and discovery in academic areas, (3) projects stressing cognitive thinking through asking and answering questions, problem solving, and creative writing, and (4) projects focusing on preparing

parents to improve the education and development of their children.

The approaches were developed primarily by colleges, universities, and private educational research organizations. These institutions, referred to as sponsors, contracted with OE and LEAs to provide curriculum materials, teacher training, and other assistance needed to install the approaches in the classrooms. OE provides basic sponsor support through grants. In June 1968, it contracted with a firm to assess the effects of the approaches at various locations.

None of the noninstructional services were eliminated when the program's emphasis changed from service to experimental. Thus, Follow Through became an experimental program in a service setting.

PHASEOUT OF FOLLOW THROUGH

Until the spring of 1972, OE's plan was to widely disseminate information about successful Follow Through approaches. One important long-range objective under consideration was to incorporate the Follow Through concept and design into the operation of programs under title I of the Elementary and Secondary Education Act.

In May 1972, however, OE changed these plans and decided to phase out the program. To accomplish this, OE had planned to drop one grade each year, starting with kindergarten at the beginning of school year 1974-75 and ending with the third grade upon the completion of school year 1976-77. However, the appropriation for fiscal year 1975 included funds for a kindergarten class to start during school year 1974-75 and, according to OE, the Congress also plans to appropriate an amount for fiscal year 1976 that will include funds for a kindergarten class for school year 1975-76. Therefore, the phaseout strategy for the program has not yet been resolved.

SCOPE OF REVIEW

Our review was made at OE headquarters in Washington, D.C., and at nine selected project sites, one each in Alabama, Arkansas, Colorado, Florida, Georgia, Mississippi, Montana, Texas, and Utah. We reviewed the legislative history of Follow Through, OE policies and procedures, project applications, and other related documents. We also reviewed the initial results of a national evaluation of Follow Through and interviewed Federal, State, and local officials responsible for administering and operating Follow Through. In addition, we observed classroom activities and interviewed selected teachers and parents of Follow Through enrollees.

Our review at the project sites covered school years 1970-71 and 1971-72. Projects reviewed included: (1) projects with at least 2 years of operating experience and (2) projects representing a variety of model approaches. We also considered a project's size and whether it was urban or rural. We believe that the problems noted are shared by many projects. Our findings and conclusions should not, however, be interpreted as necessarily being typical of all Follow Through projects.

CHAPTER 2

FOLLOW THROUGH: AN EXPERIMENTAL PROGRAM

Follow Through represents a unique attempt to better the lives of children from low-income families through imaginative, instructional approaches and a comprehensive program of health and social services and parent activities. School year 1973-74 represents the program's seventh complete year of operation and the sixth year of a national evaluation of the program. Although the evaluation was substantially revised during the fourth year of the experiment, problems in both initial design and implementation of the experiment will, in the final analysis, limit OE's ability to reach statistically reliable conclusions as to which sponsor approaches are successful for teaching young disadvantaged children. These problems, which we believe cannot practicably be overcome, include

--lack of random assignment of LEAs to sponsors and

--lack of comparable control groups.

These problems, plus the OE contractor's reservations concerning design and measurement problems, raise questions about the experiment's dependability to judge the model approaches. However, OE can capitalize on this experience as lessons learned for future experiments.

Nevertheless, initial results from the revised evaluation show that, on the basis of eight criterion measures, sponsors have achieved some differences in outcome between Follow Through and non-Follow-Through children. After completion of the evaluation, OE wants to disseminate and encourage the use of approaches found to be successful. However, OE has not yet developed plans to accomplish this.

LESSONS LEARNED FROM FOLLOW THROUGH

During its early years the national evaluation of Follow Through was strongly criticized by parties both in and outside the Federal Government because it lacked a well-defined plan. This criticism resulted in a substantial reorganization of the evaluation during school year 1971-72. Although a new evaluation strategy with specified objectives emerged from the reorganization, its overall effectiveness will be limited because of problems in both the initial design and implementation of the experiment.

Follow Through was, however, a unique experiment involving the evaluation of a three-way partnership among the school, the sponsor, and the home. Because OE lacked experience in organizing such a program, it may not have recognized the consequences of early decisions affecting the program's design and implementation. The purpose of this section, therefore, is to recall the events of the national evaluation which led to its reorganization and to suggest ways to prevent similar happenings.

History and development of the national evaluation

In the summer of 1968 OE awarded a $900,000 contract to Stanford Research Institute, Menlo Park, California, to make a national evaluation of Follow Through. According to the contract, the Institute's main tasks were to describe the various model approaches, collect data, and shape and define an evaluation strategy. The primary purpose for the evaluation, as stated in the Institute's proposal, was to provide guidance on program development.

The Institute's proposal for the second evaluation year (school year 1969-70) was approved on June 25, 1969, for about $2,150,000 and was basically an extension of the first proposal in that it called for additional data collection and further development of the evaluation plan. This proposal, prepared before the data collected in school year 1968-69 had been fully analyzed, identified to some extent the emerging evaluation strategy. This Institute's plan was to measure changes in pupil growth and achievement and parent attitudes at successive times, using various tests and other evaluation instruments, and to compare these results with those obtained on a comparable group of non-Follow-Through children.

The majority of the funds was devoted to data collecting and processing for the large number of project locations OE wanted included in the evaluation. During the 1969-70 school year, the Institute reported on the analysis of the data it had collected at 53 projects in school year 1968-69 on about 8,100 children tested in the fall and spring. In the analysis report, dated December 1969, no findings were provided for individual sponsors. Due to the developmental nature of the models at the time of data collection and to late administration of the pretest, OE decided to focus attention on later entering classes of children, called cohorts, the first being the group that entered Follow Through in the fall of 1969.

In May 1970 OE convened a panel of experts to review the contract for the national evaluation. The panel recommended that policy questions and program objectives be identified as clearly as possible. According to the panel:

> "The major concern of this reviewing 'team' * * * lies in the design of the project in terms of its actually evaluating Follow Through Projects. While the potential of most information collected for this purpose (evaluation) was explained, there seems to be an absence of a definite detailed plan designed to serve the major objective of evaluation. In fact, there seems to be some hesitancy to evaluate--in either a comparative sense--that is to compare project against project or to evaluate against specific goals."

OE approved the Institute's proposal for the third year of the evaluation on June 29, 1970, raising the total cost of the evaluation to about $7 million. According to this proposal, the Institute's main task was to develop information useful in judging the extent to which projects were producing change in the students and communities. To accomplish this task, the Institute planned to test, during the fall and spring of school year 1970-71, about 61,400 children at 107 projects representing 21 sponsors. The Institute's proposal stated that comparisons among model approaches must be made, but not until each approach had been operating at least 2 years in the manner the sponsor intended.

During school year 1970-71, OE recognized the need for greater specificity in the evaluation. As part of a previous and separate review of OE's administration of study and evaluation contracts, 1/ we requested OE to examine the Institute's performance under the contract. An OE official and a consultant performed the work, and OE wrote us on November 4, 1970, that:

> "* * * in the absence of any detailed statement of work * * *, it will be impossible to determine whether the contractor is actually doing the job which he is supposed to do. Apparently several millions of

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1/The results of this review are contained in our report to the Congress entitled "Need for Improving the Administration of Study and Evaluation Contracts, B-164031(1), August 16, 1971."

dollars of effort has been contracted for without a specification of the tasks and products of that effort."

On June 25, 1971, the Institute submitted its proposal for school year 1971-72. On June 29 OE approved the proposal, with the provision that the Institute later submit detailed plans for the work to be performed during the school year. The Institute submitted the plans in September, but, following a review by a panel of experts, OE requested that the plans be revised. The Institute submitted the revised plans in November but OE also rejected these.

According to the Institute, its problem in developing detailed plans acceptable to OE occurred because the groups within HEW which had responsibility for or direct interest in this evaluation contract were reformulating the program and transmitting these changes to the Institute. This situation was further complicated by OE personnel and organization changes. The Institute said that during June 1971 the Follow Through Director left the Government and a new director was named. Also, in July the project officer for the Follow Through evaluation and the OE office that had cognizance over the project were changed.

In December OE decided to reorganize the evaluation. In a December 10, 1971, memorandum to OE's Office for Program Planning and Evaluation, the OE official in charge of the evaluation said:

> "While the responsibility for design was shared with SRI [the Institute] in the past, criticisms about the overall conceptualization from the GAO and other sources made it clear that this 'joint venture' mode was not a workable arrangement. Therefore, this responsibility has now been assumed by USOE. An intensive study of the overall design of Follow Through is now being initiated by USOE."

The memorandum also said that the Institute's latest proposals and other evidence indicated that the contractor had limited ability to analyze and report data.

To change the evaluation, OE, assisted by a consulting group, assumed full responsibility for specifying the experimental design, tests, and the projects where testing would be done. In addition, OE selected another contractor to analyze the student achievement, teacher, and parent data being collected and processed by the Institute, but had the Institute continue to analyze and report on classroom observation data.

The evaluation strategy that emerged from these changes retained the Follow Through and non-Follow-Through comparison concept. In addition, rules were estabished governing the selection of projects where testing was to be done and which children would be tested. Projects were selected to maximize sponsor comparisons.

According to the request for proposals that OE sent out to prospective bidders for the analysis, the new evaluation was to seek answers to questions such as:

--How does Follow Through compare to the schooling disadvantaged children typically receive?

--What are the benefits of the model approaches?

--Are the effects of the approaches consistent?

--Have the approaches been implemented properly?

--Does Follow Through have more impact on children who had preschool experience than on children lacking this experience?

--Do the effects on the children multiply with each passing year?

--Are the effects of Follow Through and of individual approaches constant regardless of the child's characteristics, such as ethnic origin, sex, and age?

Thus the evaluation began to address specific evaluation issues. The cumulative effect of not having specific objectives and goals is difficult to assess in terms of (1) the costs incurred during the first 3-1/2 years of evaluation for testing and other activities which will only be marginally useful and (2) the extent to which the above questions can be answered with confidence.

Initial definition and scope of program

According to program documentation, the Follow Through experiment was originally designed to provide information for use when the program was expanded from experimental to service or operational proportions. However, the specific information that OE wanted was not specified to the contractor until the national evaluation was reorganized beginning in the late fall of 1971.

Initially, the sponsors' approaches also were not fully developed as indicated in OE's request for proposals for data analysis which stated that:

> "* * * no one [sponsor] was fully prepared to move into the primary grades with a completely developed, radically different program. However, a number of approaches seemed to be sufficiently well developed and to have enough institutional support that including them in Follow Through was justified."

Not until a July 1972 meeting did the OE official in charge of the evaluation request the sponsors to make their objectives explicit and to devise evaluation plans for those objectives not covered in the national evaluation. OE followed up on this request with a memorandum to the sponsors in November 1972.

Although the evaluation objectives and goals were not precise, Follow Through planners designed a framework for large-scale experimentation and evaluation. From mid-December 1967 to June 1968, OE identified and selected 14 sponsors and 64 additional projects to participate in Follow Through and awarded a contract for extensive data collection. At the start of the second year of Follow Through, which was also the first year of the experiment, there were 103 projects and 14 sponsors serving approximately 15,500 low-income children in 2 grades.

According to the minutes of a March 1968 meeting which OE held to develop plans and procedures for a national evaluation, OE envisioned Follow Through and its evaluation as having two stages--a formative stage in which to develop the model approaches and a summative stage in which to assess and compare their effects. Some participants at the meeting suggested that projects still in the formative stage be excluded from the national evaluation, a strategy not closely followed in the evaluation that evolved. Although OE and the Institute avoided making sponsor comparisons and the Institute collected formative information on the projects' progress in implementing the model approaches, much summative data on pupil achievement was also collected which, as previously discussed, will not be used for evaluation purposes or will be only marginally useful.

OE required the 64 LEAs that implemented Follow Through projects in 1968 and encouraged the 39 that implemented projects in 1967 to select any 1 of the original 14 approaches.

As a result, sponsors were unevenly distributed among projects and regions of the country. Some sponsors became associated with many projects while others worked with only a few, and some sponsors had their approaches implemented only regionally. Beginning in 1969, OE took steps to improve the geographical distribution of sponsors by limiting project choices to a list of from two to four sponsors.

Impact of initial design decisions on national evaluation

Because test samples used before the evaluation was reorganized were not designed to assess differences among sponsors, interim findings on the children who entered the program in the fall of 1969 and 1970 give very little information about differences among sponsors--a primary objective of the reorganized evaluation.

The Follow Through national evaluation involves three entering classes of children, called cohorts. In general, the children are tested as they enter school (either kindergarten or first grade), at some intermediate point and when they leave the program at the end of the third grade. The chart below shows the progression of children involved in the evaluation through the grades by cohort and school year.

	School year (note a)					
	1969-70	1970-71	1971-72	1972-73	1973-74	1974-75
Cohort 1	K 1	1 2	2 3	3		
Cohort 2		K 1	1 2	2 3	3	
Cohort 3			K 1	1 2	2 3	3

a/Each cohort includes two groups of children--one which entered kindergarten and one which entered the first grade.

According to OE, the data collected before the revision of the evaluation design (cohorts one and two) will be used, but because the data is not as stable, nor as large or comprehensive, as the data for cohort three, conclusions about model effectiveness have been delayed. The program's ultimate effectiveness will be determined by the degree to which it has fostered the development of successful sponsor approaches for teaching young disadvantaged children.

According to an OE official, it takes about 1-1/2 years to analyze and report the results of the Follow Through evaluation data. An assessment of program effects should, therefore, be available for each cohort either after 4-1/2 or 5-1/2 years, depending on when the children entered Follow Through; that is, at kindergarten or first grade.

Data on the children who entered Follow Through in the fall of 1969 (cohort one) has been completely analyzed. According to OE, sponsor comparisons have been made, even though in many cases there were too few sponsors with comparable projects where sufficient testing had been done to permit adequate comparisons.

Data on the children who entered the program in the fall of 1970 (cohort two) has not been analyzed, but OE plans to use it to compare the effectiveness of various sponsor approaches at the end of the third grade. According to OE's September 1974 request for proposals to analyze selective Follow Through data collected through the spring of 1974, data on both the children who entered the program in 1969 and those who entered in 1970 (cohorts one and two) is considered developmental and does not represent a strong analytic data set because of limited testing at intermediate points.

For judging model effectiveness, OE has, therefore, decided to rely most heavily on cohort three; that is, the children who entered Follow Through in the fall of 1971. Because the data collected on the children entering in 1971 is more reliable than that collected in 1969 and 1970, it is to be used to answer most of the evaluation issues under study. OE hopes that the effects observed from the earlier test samples will provide some indication of the consistency of sponsor effects.

Our analysis, however, as shown in the following table, indicates that OE's ability to determine the extent that cohort one results confirm those from cohort three will be limited. Based on the 10 sponsors included in the first evaluation report on cohort three and their projects that are scheduled for exit level testing at the end of the third grade, cohort continuity is as follows:

Number of projects across cohorts

Sponsor	Cohorts one and three	Cohorts two and three	Cohorts one, two, and three (note a)
1	1	5	1
2	-	3	-
3	3	4	3
4	2	3	2
5	3	6	3
6	1	3	1
7	1	3	1
8	-	-	-
9	1	3	1
10	1	3	1
Total	13	33	13

a/The projects included in this column were also included in the count for the other two columns on cohort continuity.

With regard to cohorts one and two results confirming those from cohort three, nine sponsors have more than two projects in cohorts two and three, but, in cohorts one and three, only two have more than two projects. Also for the three cohorts involved in the evaluation, only two sponsors have more than two projects with which to determine the consistency of sponsor effects across all three evaluation cohorts. The remaining projects scheduled for exit level testing in cohort one (five) and cohort two (nine) may still be useful, according to OE, to provide some indication of the consistency of sponsor effects. At the completion of the evaluation, however, OE's ability to determine the extent that cohort one results confirm those from cohort three will still be limited, as will its ability to determine the extent that the evaluation results repeat themselves across the three cohorts.

In summary, cohort one data combined with the data collected on the children who entered Follow Through in school year 1968-69 will make a considerable amount of evaluation data only marginally useful because it was collected before specific evaluation objectives were specified. The former Follow Through Director said in an article on the accomplishments and lessons learned from Follow Through that, during future experiments, program impact data should not be collected until the program's projects are solidly established.

Further, as discussed later in this report, there are also design and measurement problems connected with the experiment which affect the reliability of the Follow Through results, including those for the children who entered in the fall of 1971 (cohort three).

OE also plans to assess sponsor consistency across cohorts in another way. It will look at the degree to which a sponsor achieves the same patterns of effects over cohorts. For example, a model may have different effects on children who have had preschool and those who have not, or in large urban areas as opposed to rural areas. If such patterns occur, they will be verified on more than one cohort to determine if they are true patterns. If such true patterns are identified, this could be another way of assessing sponsor consistency. However, the validity of this approach remains to be seen.

As of July 1974 the contracted cost of the national evaluation was about $23.1 million. This amount represents the cost of the contracts with the Stanford Research Institute, the consulting firm assisting OE, and the contractor performing the data analysis. However, the total Federal cost of evaluation is even greater because (1) LEAs have been paying with grant funds the salaries of assistant testers and test aides since the spring of 1970, (2) OE has made grants to sponsors to make separate evaluations of their models to supplement the national evaluation results, and (3) OE has awarded numerous smaller research and evaluation contracts for various purposes.

Impact of change from service to experimental program

Another lesson from Follow Through involves the relationship between Follow Through as a service and as an experimental program. The former Follow Through Director said in his article that, because this relationship was never fully established, progress in the experiment was impeded. Also, a Follow Through review panel reported in March 1973 that:

> "* * * by congressional authorization Follow Through is a community action and social service program, while by executive direction it is a planned variation experiment. This ambiguity over the purpose of Follow Through has continued to exist in many people's minds, both in and outside the government, since its earliest beginnings and is a key reason why many of the evaluation issues have never been resolved successfully."

The former Director's statement and the views of the panel imply that experimental programs should be clearly authorized as such before they are undertaken.

EXPERIMENTAL PROGRAM RESULTS

To determine the results of the Follow Through experiment, we reviewed the two available Follow Through evaluation studies which include information on eduational gains as measured by achievement tests. According to the OE official in charge of the experiment, those two studies plus one in draft form and three based on classroom observations are the most important studies on the experiment.

The OE official said that the first two classroom observation studies are considered developmental, but the third one reports some significant findings regarding classroom instructional practices. The results, which are based on systematic observations of the Follow Through classrooms in action, indicate that highly controlled classroom environments contribute to higher scores in math and reading and that flexible classroom environments contribute to desired child behavior such as independence, lower absence rates, and higher scores on a test of nonverbal reasoning.

This section addresses the two studies based on achievement tests because such tests serve as the primary measuring device in Follow Through and most federally funded experimental education programs. The focus is on the more recent study because it deals with cohort three--the best one for determining model effectiveness.

The initial results on cohort 3 covered 10 sponsors and were reported on March 1, 1974. These results represent the first from the revised evaluation strategy and reflect the first year progress of kindergarten children who entered Follow Through in the fall of 1971. OE, in a June 1974 summary of that report, concluded that there is reliable evidence that systematic differences among the 10 sponsors' approaches have been achieved. OE concluded also that most of the sponsors are showing evidence of developing the children's motivation and that six are having some effect upon the children's sense of personal responsibility. OE based its conclusions solely on educationally significant differences between Follow Through and non-Follow-Through students on eight criterion measures. Four of the eight measures tested academic skills and four tested nonacademic attributes.

Our conclusions on the March 1974 report differ from OE's because, before applying the OE educational significance test, we first determined whether a difference between the gains of Follow Through and non-Follow-Through children was statistically significant. A test for statistical significance is essential to provide confidence that the differences derived are not due to chance and that the results can be generalized to a larger population of interest (e.g., children from low-income families previously enrolled in Head Start or similar preschool programs). OE officials said they did not report on tests of significance in the June 1974 summary because the assumptions required for this test to be valid were not met; that is, the LEAs in Follow Through were neither randomly selected from the population of interest nor were they randomly assigned to a sponsor approach.

Sponsor effects were measured in standard deviations; that is, a statistical measurement which measures the variation of individual values from an average value. OE considered a difference equal to or greater than 0.25 standard deviation units of the item being measured as educationally significant and, therefore, a positive effect for Follow Through. The OE summary of the March 1974 results and our analysis of those results are shown in the table on page 18. Both analyses show the results the 10 sponsors achieved in 4 categories: (1) academic achievement, (2) achievement motivation, (3) personal responsibility, and (4) attendance.

When a statistical significance test is applied before determining educational significance, the extent of systematic difference among sponsors is not nearly as great. For two categories--personal responsibility and attendance--the most pervasive result is that there is no significant difference in the outcome of Follow Through and non-Follow-Through children.

Because projects, classrooms, teachers, and children were selected judgmentally, the March 1974 evaluation results analyzed by us do not have the statistical reliability that is desired for generalizing from the results of an experiment such as Follow Through. Nevertheless, our analysis does show that relying on educational significance alone could lead to generalizations that overstate the positive effects of Follow Through. OE officials told us that they are working with the data analysis contractor to develop methods of analyzing the data so that generalizations will be possible.

Number of sponsors		
OE analysis	GAO analysis	Criterion measures used
		Academic achievement--4 measures:
3	1	FT better than NFT on all 4 tests
-	1	FT better than NFT on 3 tests
1	1	FT better than NFT on 2 tests
2	1	FT better than NFT on 1 test
1	-	FT better than NFT on 1 test and NFT better than FT on 1 test
1	2	NFT better than FT on 1 test
1	-	NFT better than FT on 2 tests
1	-	NFT better than FT on 3 tests
-	4	No difference between FT and NFT
10	10	
		Achievement motivation:
8	6	FT better than NFT
1	1	NFT better than FT
1	3	No difference between FT and NFT
10	10	
		Sense of personal responsibility--2 measures:
1	-	FT better than NFT on both tests
5	1	FT better than NFT on 1 test
2	-	NFT better than FT on 1 test
2	9	No difference between FT and NFT
10	10	
		Attendance:
3	1	FT better than NFT
7	9	No difference between FT and NFT
10	10	

FT: Follow Through
NFT: Non-Follow-Through.

Some interim results on earlier cohorts of the experiment were reported in February 1973 and cover 9 of the 10 sponsors analyzed in the March 1974 report. Those results generally did not show the degree of sponsor diversity indicated in the March 1974 report. Although some small degree of diversity was apparent, none of the sponsors had the widespread success or failure shown in the March report. Moreover, three sponsors that showed strong gains or losses in the March 1974 report showed completely opposite results in the earlier one. Consequently, it is difficult to state that sponsor trends have been established.

Because only interim results are available for cohorts 1 and 2 and because those for cohort 3 represent achievement at the end of only 1 year of participation, it is too early to draw firm conclusions about the stability of the results of the 10 sponsor approaches analyzed. Some sponsors may not be able to maintain the gains shown to date, whereas others may not produce gains until the later years of the experiment. Further, any significant effects from the approaches may not be immediately apparent but rather may occur in the first, second, or third grades or even later.

OE has no formal plans to evaluate the progress of children after they graduate from Follow Through. In March 1973 a Follow Through review panel recommended such an evaluation, but a decision to follow up on Follow Through children has not been made. OE is, however, considering the feasibility of testing former Follow Through and non-Follow-Through children entering the fourth grade in school year 1975-76.

Reliability of experimental results

Even though OE reorganized the evaluation design for Follow Through during the fourth year of the experiment, problems in both the initial design and implementation of the experiment limit attempts for overall conclusions that are statistically reliable for evaluating alternative approaches to early childhood education. These problems include

--no random assignment of LEAs to sponsors and

--differences in initial achievement levels and socioeconomic characteristics between the experimental and control groups.

In addition, the data analysis contractor listed in the March 1974 report several reservations concerning design and measurement problems which also affect the reliability of results. Two such reservations were (1) methodological limitations stemming from the lack of available knowledge in modern education research to measure all the Follow Through variables and (2) inability to identify the "best" sponsor due to qualitative differences in materials and procedures used and in functions and skills emphasized. The reservations combined with the problems, which we believe cannot practicably be overcome, raise questions about the dependability of the evaluation to judge the approaches.

Because LEAs were not randomly assigned to an approach and because most were not restricted in their choices of approaches, the children in Follow Through and their comparison counterparts are not representative of any definable larger populations and the overall distribution of projects among sponsors is irregular. The significance of this is that generalizations cannot be made beyond the characteristics of the groups of children, parents, teachers, or institutions analyzed. According to the data analysis contractor, ethnicity, integration, city size, and geographical region are all associated with student effects in some way or other, but none are uniformly distributed among sponsors. Also, because LEAs were, for the most part, permitted to select sponsors, the contractor could not estimate whether the outcome of one sponsor's program would be similar to another sponsor's or whether other projects would respond similarly to a particular sponsor.

Another result of most LEAs not being restricted in their choice of approaches is that some sponsors were associated with only a few projects. The evaluation design for cohort three--the one OE plans to rely most heavily on to determine model effectiveness--requires that a sponsor be working with at least five projects where adequate testing had been done to be compared with other sponsors.

Only 7 of the 22 sponsors met that requirement. In addition, the March 1974 report includes three others, two with three projects and a third one with four projects. According to the OE official in charge of the evaluation, five projects are needed per sponsor to provide a confidence level which insures that Follow Through effects are attributable to sponsor intervention rather than other factors which can affect educational achievement.

Differences in initial achievement levels and socioeconomic characteristics also affect the reliability of the evaluation results. Because Follow Through and non-Follow-Through children were not randomly selected for participation in the experiment, the experimental and control groups were not comparable in terms of initial achievement and socioeconomic characteristics. In an effort to adjust for the initial differences, the data analysis contractor used a statistical technique known as the analysis of covariance. However, the contractor reported that the Follow Through data failed to meet some requirements believed necessary for this technique to be an effective adjustment device.

Further, no known statistical technique can fully compensate for initial differences on such items as pretest scores and socioeconomic characteristics. Accordingly, as OE states in its June 1974 summary, "* * *the basis for determining the effects of various Follow Through models is not perfect." Our review of the March 1974 report indicated that, for at least four sponsors, the adjustments were rather extensive. Included among the four is the only sponsor that produced significant differences on all four academic measures and the only two sponsors that produced any academic results significantly below their non-Follow-Through counterparts.

According to OE, while it is proper to observe that the lack of random assignment of treatments and the lack, in several cases, of comparable control groups will make it difficult to draw conclusions about the effects of Follow Through approaches, such conditions typify social program evaluations and educational evaluations in particular. We recognize that these problems are not peculiar to the Follow Through program, but believe that when the decision was made to conduct the program as an experiment, greater care could have been exercised to minimize the effects of not following the ideal experimental procedures.

Because there is no known method as yet to fully compensate for initial differences between experimental and control groups and because many previous educational experiments have tended to indicate relatively small gains, the more the ideal procedures can be implemented, the less susceptible final results will be to serious mismatches in the two groups.

Combined with the shortcomings in the experiment's design and implementation, the lack of complete data in the data collection process also affects the representativeness of the evaluation results. Our review of the contractor's data in the March 1974 report plus source documents describing the national evaluation indicated that, for the 10 approaches covered in the March report, only 48 of the 93 projects that make up those approaches were included. The projects not included were, for the most part, those that lacked sufficient baseline data. Thus, it is questionable whether the projects reported on are representative overall of the 10 approaches.

For the 10 sponsors, the data analysis contractor indicated further limitations in that the results analyzed were for those children for whom data on all the important

measures could be obtained. For example, of the 6,000 Follow Through children tested for cohort 3 in the spring of 1972, 2,000 were not reported on in the March 1974 report. About 40 percent of the 2,000 children not reported on were lost to the program through attrition.

OE estimates that about 50 percent of the kindergarten children for cohort three will be lost through attrition by the end of grade three. The consequence of attrition on the Follow Through experiment is that the remaining children may not be representative of all of the effects of the program. As a result, there is no assurance that a representative number of students has been included in the analysis.

PROGRAM REPLICATION

During hearings on OE's fiscal year 1974 appropriation, OE officials told the Congress about the planned termination of Follow Through and about their ultimate intention to disseminate successful Follow Through models to LEAs throughout the Nation, if the final results of the national evaluation warranted dissemination. Because OE still plans such dissemination and has developed tentative success criteria to judge the models, this section will address the need to develop advance plans to accomplish this.

The implementation process is important because it must provide reasonable assurance that the results achieved by the experiment will be replicated (repeated) in the new communities. Thus, the process OE selects should be tested before it is used for widespread dissemination of Follow Through models.

OE has not yet developed appropriate plans for replicating Follow Through approaches. During the fall of 1971 OE had started a long-range plan to expand the number of Follow Through projects in each State but terminated it about 6 months later. As of April 1974, OE's Office of Planning, Budgeting, and Evaluation was implementing a new concept known as "Project Information Packages" for replicating successful compensatory education projects, but OE officials cannot agree on whether Follow Through models should be replicated under this concept.

Long-range plan

OE's goal for this plan had been to develop within each State over a 5-year period the capability to bring Follow Through to as many children from low-income families as

possible. Besides anticipated increases in the Follow Through appropriations for the additional projects, title I of the Elementary and Secondary Education Act and State and local funds were to be used.

OE planned to select existing exemplary projects and turn them into resource centers for new project staffs to contact or visit for information. In addition, OE planned to retain the sponsors to work with and help the new projects implement successful approaches.

In short, the long-range plan would have involved (1) a gradual phase in of the Follow Through experiment, (2) an increase in the number of communities working with Follow Through models, (3) the conversion of Follow Through from a research and development to a predominantly service-oriented program, and (4) the merger of the Follow Through concept into the operation of the title I program. Greater support for Follow Through from title I was planned because, according to OE, "components of a typical Follow Through are [the] same as an effective title I project."

In October 1972 an OE official told the Follow Through program office that its 5-year replication program had been replaced by a new incentive grant program being developed for title I. Later, OE announced its plans to terminate Follow Through. An OE planning official told us that the decision to replace the long-range plan had been made in the spring of 1972 and had been based on a planning philosophy that research and development programs, such as Follow Through, should not have service objectives. He said that Follow Through models should not be replicated until all the results are in and they have proven successful. According to the official, the incentive grant program was envisioned primarily as a program for replicating successful reading and mathematics projects but the Office of Managment and Budget did not approve it.

Project information packages

The project information package concept involves collecting and assembling information needed to install an educational approach in the classroom. A package will contain descriptive literature, schedules, budgets, procedural guides, filmstrips and audiocassettes, self-instructional training programs for teachers, lists of teaching aids and equipment, and other materials needed to install and administer an approach. OE hopes that the packages will be sufficiently self-explanatory to enable school administrators

to install an approach and achieve successful results without much assistance from the sponsor.

To determine whether the concept will work, OE has identified six successful compensatory education approaches (none of which were Follow Through) and collected the necessary information to package them. Each packaged approach is now being field tested at several LEAs.

According to officials in OE's Office of Planning, Budgeting, and Evaluation, Follow Through approaches are candidates for replication under the packaging concept. However, because the packaging concept does not necessarily provide for the input of the sponsor at the replication site, the Follow Through Director believes that Follow Through approaches cannot be successfully implemented under this concept. She favors a program more like that provided for under the long-range plan. However, she said that OE has not yet developed appropriate plans for replicating Follow Through approaches.

In planning for replication, OE should consider, among other things, the necessary cost. According to a 1973 cost study done under contract for OE, the average Federal per pupil cost of Follow Through in school year 1971-72 was $747. This cost is in addition to the LEAs' normal per pupil expenditure. The 41 projects studied were believed to be representative of the 178 in operation during school year 1971-72. The $747, in addition to Follow Through funds, includes title I of the Elementary and Secondary Education Act and other Federal funds, such as model cities and manpower training.

During OE's fiscal year 1974 appropriation hearings, OE officials told the Congress that in school year 1972-73 Follow Through's average per pupil cost had dropped to $617 and that its goal was to lower the cost to $600. In comparison, the title I program, similar in services to Follow Through, cost only about $220 per pupil for school year 1971-72, the most recent for which OE statistics were available.

CONCLUSIONS

School year 1973-74 represents Follow Through's seventh year of existence and its sixth year of experimentation with approaches to educating disadvantaged children in the early grades of school. Through June 1974 an estimated $300 million had been made available for the program, and according

to OE about 71,000 children had completed it. Problems, however, in both the initial design and implementation of the experiment will limit OE's ability to reach statistically reliable overall conclusions on the success or lack of success of the approaches for teaching young disadvantaged children.

The problems cannot practicably be overcome, and, when combined with the OE contractor's reservations about design and measurement problems, raise questions about the experiment's dependability to judge the appproaches. Incomplete data in the data collection process also limits the representativeness of the evaluation results. The problem of data reliability could have been minimized if OE had, when Follow Through's emphasis changed from service to experimental, developed detailed specifications for the evaluation.

On the basis of 10 sponsor approaches, initial results from the revised evaluation indicate that there are differential effects among the approaches. It is too early, however, to draw conclusions about their relative merits. Because the evaluation data collected during the first 3 years of the experiment is of questionable usefulness for judging model effectiveness, OE has to rely most heavily on data from the last group of children participating. In addition, OE will have only limited opportunities to determine the extent that the evaluation results repeat themselves across certain cohorts.

The questionable benefit of the Follow Through experiment affects OE's plans to disseminate information on successful approaches. Because limitations in the data affect OE's ability to draw reliable conclusions about the success of the approaches, such limitations also affect OE's plans for replicating approaches.

In the future, experiments generally should be designed on a small scale and have a limited number of projects to define implementation procedures and program objectives and goals. After development, the program can be expanded to more projects, if necessary, to assess its effects. Further, any evaluation done during development should be on a small scale, as an aid to developing the program rather than assessing its effects, as happened in Follow Through. In future large-scale experiments, the framework for the experiment should be designed at the same time the evaluation objectives are established so that one will not limit the effectiveness of the other, as happened in Follow Through.

OE should use the Follow Through experiment as a case study to plan and carry out future experimental programs.

RECOMMENDATIONS TO THE SECRETARY OF HEW

We recommend that the Secretary direct OE to:

--Develop greater safeguards to insure that future experimental programs are not designed apart from evaluation to maximize the degree to which experimental results will be statistically reliable.

--Translate the problems encountered during the Follow Through experiment into criteria for designing and administering future experiments, including, among other things, criteria to prevent collecting massive data on program results before program goals and objectives are properly defined.

AGENCY COMMENTS

HEW commented on matters discussed in this report by a July 28, 1975, letter. (See app. I.) It concurred with our recommendations and said it will try to insure that legislation and regulations for future experimental programs are consonant with strong evaluation designs by requiring random assignment of projects to LEAs, schools, classrooms, etc., and requiring LEAs to establish and maintain comparable control groups or schools. OE will formally advise all program offices of the importance of making evaluation an integral part of experimental programs.

HEW said the experience of Follow Through reemphasizes the need for planning before implementation of new program designs or major changes in basic program thrust. OE now has a centralized evaluation staff responsible for developing evaluation designs based upon program objectives so as to prevent unnecessary data collection. HEW said this staff is cognizant of the problems encountered in Follow Through and will, to the extent possible, incorporate our recommendations in the overall evaluation designs.

CHAPTER 3

NEED TO IMPROVE PROJECT ADMINISTRATION AND PROGRAM MONITORING

Follow Through offers various noninstructional services and activities aimed at lessening the effects of poverty and enhancing children's chances to lead normal, productive lives. These components consist primarily of parent involvement; community involvement; and supportive services, such as medical and dental examinations for the children.

In general, the LEAs had provided for each required service and activity but needed improvement in their administration. Project achievements in the noninstructional area varied from one LEA to the next and a need existed to increase the end results. In addition, LEAs needed to improve their recordkeeping for evaluation purposes and, in some instances, to comply more closely with funding requirements.

The reasons for these weaknesses and the uneven results among LEAs in delivering services seemed to be that (1) OE had not furnished adequate guidance to implement the noninstructional components and (2) OE's monitoring of project results had been ineffective. During our review OE improved its monitoring system, but additional changes are still needed.

PROJECT ADMINISTRATION OF SERVICE COMPONENTS AND PROGRAM REQUIREMENTS NEEDED IMPROVEMENT

We examined the LEAs' performance in various areas, including the delivery of medical, dental, nutritional, guidance, and psychological services to eligible children and the delivery of social services to both eligible children and their families. In addition, we evaluated the extent and ways in which parents and other individuals and agencies from the community were involved in project affairs, including coordination with local Head Start projects.

Although each project differed in many ways, such as geographical location and project size, all needed to improve project administration to some extent. Services could have been increased, recordkeeping needed improvement to enhance evaluation, and funding requirements were not always complied with. In addition, the LEAs varied in the level of services provided. Highlights from selected areas are discussed in the following sections.

Variation in and need to increase services

The draft program manual, which was in effect at the time of our sitework, contained guidance to LEAs on the requirements for each program component. It provided that each project have a policy advisory committee, made up of parents and other community members who must play a substantial role in planning and managing project affairs.

Of the nine projects, seven had a policy advisory committee, one had a parent board, and one had two parent boards. The two projects with parent boards were parent implemented in that the parents, through the board, made the program's operating decisions. Most committees and boards were organized along the lines suggested in the program manual and met regularly, usually once a month.

To determine the extent of committee and board involvement, we reviewed the minutes of their meetings; observed meetings; and interviewed project officials, committee and board members, and parents of Follow Through children. In our opinion, one committee and one board were actively involved in planning and managing project operations, four had a voice in project decisionmaking but a need for greater involvement existed, and three had little involvement in project affairs.

The active committee and board made numerous important decisions and actions. For example, they both established project staff selection criteria, organized parent activities, and helped develop the project's annual budget. In addition, the parent board hired and dismissed staff members and considered educational matters, such as a decision to release teachers from their normal duties to visit parents periodically.

Four committees made a few such decisions but, could have improved their performance. The major emphasis of three of these four committees appeared to be on their own operations, including selecting officers, forming subcommittees, selecting representatives to attend conferences, and planning social gatherings, rather than on program matters, such as developing plans and criteria for obtaining parent and community involvement. The effectiveness of the fourth committee was questionable because 13 of 21 Follow Through parents we interviewed said they were not even aware the committee existed.

The minutes of the three committees which had little involvement in project affairs showed little evidence of accomplishments. Project officials and committee members

acknowledged the passive role that their committees had played in project operations. They gave us the following reasons for lack of committee involvement.

--Lack of interest, experience, and education of low-income parents.

--Substantial turnover of committee members and officers. At one project the parent coordinator told us that the leadership ability of the committee had been affected because of lack of continuity in committee members.

--Reluctance of members to express themselves in the presence of the project director who attended committee meetings. This occurred at only one project. The apparent reason for the members not speaking out was that more than one-third were also project staff. The committee president believed that the employer-employee relationship detracted from member objectivity. This committee was being reorganized at the time of our sitework.

The projects were taking actions to increase committee involvement when we completed our sitework.

Parent participation in the Follow Through classroom

The draft program manual also provided that parents be used in the classroom, in the Follow Through office, or in other capacities working as volunteers. To assess project performance in this area, we examined project records and interviewed parents and project personnel.

The records, although not always complete, showed wide variation in parent participation among the projects. For example, one project which served 256 families recorded in school year 1970-71 about 14 days spent by parents in the classroom or on other project activities. In contrast, another project which served about 900 families recorded about 600 days spent by parents in the classroom. Its officials felt that even more parents should have participated, but said that some did not have transportation.

In addition to the first project cited above, three other projects appeared to have little parent involvement in the classroom.

--Of 13 teachers interviewed at one project, 4 said that parents were not involved in classroom activities and 9 said that parents participated but only to a limited extent.

--The program coordinator at another project said principals at the Follow Through schools prohibited untrained persons from working in the classroom. This project's records for school year 1970-71 showed that only one parent worked as a classroom volunteer.

--At the remaining project, which consisted of 15 Follow Through classrooms, a consultant reported that the teachers at the school where 12 of the classrooms were located gave visitors the impression they were not welcome. Later, the project distributed a questionnaire to parents of children who attended this school. Forty percent, or 32 of the 81 parents responding, indicated that they felt unwelcome in the school or that the school treated them as intruders.

Health care

Each project child from a low-income family is eligible to receive a medical and dental examination with related tests once every 2 years while in Follow Through. To measure the extent to which this requirement was met, we selected about 1,300 children from the 9 projects reviewed and determined the number eligible for examinations and of those eligible, the number who received examinations and needed treatment.

Health records showed that 53 percent of the approximately 880 children in our sample who were eligible for medical examinations and about 80 percent of the approximately 900 children eligible for dental examinations received them. Of the eligible children examined, 30 percent needed medical attention and 70 percent needed dental treatment. About 75 percent of the children so referred were treated.

For the following reasons, not all eligible children were examined:

--Some project nurses did not understand the program guidelines in that they thought that only one medical and one dental examination were required while a child was in Follow Through.

--Some parents refused or delayed signing parental permission slips which were required before children could receive health services.

--Staff was not always adequate.

The projects which achieved the best examination results were those that obtained parental permission early in the school year and at one time for all health services contemplated. Also, as followup, one project had established the procedure of showing on the individual health records additional services that each child needed to receive.

Project records needed improvement

The draft program manual did not specify what records projects should keep to document their performance. We believe that guidance is needed because some recordkeeping improvements were needed at all of the projects reviewed.

Documentation supporting the eligibility of the children enrolled in the program was incomplete at all but one project. This matter, discussed separately and more fully in chapter 4, is introduced here because projects needed complete eligibility records to adequately administer the noninstructional services paid for with Follow Through funds. Because only children from low-income families are entitled to these services, records were needed to identify the family income of each child enrolled in the program.

Most projects also needed to improve their recordkeeping in the health area, because many records were incomplete. One project had kept no health records before school year 1970-71. At another project, of 100 children we selected at random to determine whether they had received a dental examination, 98 had incomplete or unavailable records. At a third project, where we also selected at random 100 children, immunization records were inadequate for 40.

Two projects kept health information in more than one place. At one of these projects, for example, children's health folders at two of the three schools were kept in the classrooms by the teachers instead of by the nurse. Moreover, the folders did not show all the services provided because some data was maintained separately in the principal's office or in the social worker's files.

Five projects needed to improve their recordkeeping of home visits. At one project, records were not current. At another, records of some home visits were not kept, and those on file did not clearly show the reasons for the visits. Another project recorded each home visit in a log book. The log showed the number of home visits that had been made overall, but information about individual families, such as how often were they visited, why were they visited, and what additional visits needed to be made, was not readily available.

In our opinion, good records are essential to evaluation which is essential to good management; accountability; and, in an experimental program, the interpretation of results. Without adequate records, areas warranting improvement may not be identified and the ability to compare project results is limited.

Administering funding requirements

All the projects reviewed, to some extent, either did not meet or could not prove that they had met program requirements pertaining to the source, use, and control of funds.

None of the LEAs could prove that they had contributed the non-Federal share 1/ required by their approved project applications. In school year 1970-71 these LEAs claimed to have made contributions totaling about $525,000, of which at least $230,000 was either inadequately documented or not documented at all. About half of the $230,000, which was claimed as in-kind contributions by one LEA, was based on an overtime account which did not show specific dates, times, duties, or signatures of persons receiving payments. In addition, some of the documented contributions were questionable. For example, one project claimed as an in-kind contribution $2,590, representing the value of admission to a final dress rehearsal of a circus that was free to anyone in the community who wanted to attend.

Four LEAs had not contributed the required amount of title I funds to their projects in school year 1970-71. For example, one project's budget indicated that title I funds would be used to procure services, equipment, and materials valued at about $90,000 for the project. Although documentation was generally lacking, the LEA's title I director said about $49,000 of the planned contribution to Follow Through had not been made. Another project did not know how much of the required title I contributions had been made to Follow Through. At our request, the project computed the amount actually contributed and found it to be $10,880 less than the amount proposed in the project application.

1/To supplement Federal funding, OE requires each grantee to provide annually, depending on the number of grades served, 14 to 25 percent of the grant award, consisting of either cash or in-kind contributions which are services, materials, and property owned by or donated or loaned without charge to the project. Grantees are required to show that contributions claimed have actually been made.

Although Follow Through funds for health services can be spent only for children from low-income families, at seven projects some children from non-low-income families received these services at program expense. At most projects this occurred because project staffs provided health services without making eligibility determinations. One project, for example, spent about $1,480 in school year 1970-71 for medical and dental services for 51 of the project's 53 children who were ineligible for health services. We brought this situation to the attention of the project director who took action to correct this practice.

Significance of weaknesses in administration on program effectiveness

In our opinion, the variation in services and other needed improvements decreased program effectiveness in two ways. From a service viewpoint, some of the potential of helping eligible children and their families overcome the effects of poverty was not maximized. From an experimental viewpoint, the Follow Through program had been designed to include the services and activities because of the belief that they would help a child succeed in school. Because the national evaluation did not include measuring the impact of the services, they should have been constant among projects to the extent feasible so that differences in educational attainment could not be due in part to differences in the level of services.

NEED FOR MORE PROGRAM GUIDANCE

Before the final Follow Through regulations were issued on April 21, 1975, OE's project guidance was contained primarily in the draft program manual. The manual set forth the required program components, such as parent participation, and described in general terms, services, and activities desired under each component.

The manual contained little criteria defining the desired level of project performance in each component. In addition, the manual provided no guidance on recordkeeping to document project performance and did not require projects to formally evaluate their activities. The manual stated that:

> "Although there are no fixed requirements for local evaluation, applicants may devise procedures to study questions of particular local interest in their projects and to receive program feedback."

The final Follow Through regulations, which became effective June 5, 1975, more specifically define program component objectives, but do not contain specific performance standards.

They do provide that refunding of a project be based largely on how well the LEA provided the required services and activities.

In our opinion, it would be difficult to hold LEA officials accountable for their performance unless the extent of required services and activities is specified. Therefore, OE should, to the extent practicable, define the performance standards which projects must meet to obtain refunding. Performance standards are needed to identify areas needing improvement and to establish a higher and more uniform level of performance throughout the program.

The final regulations stipulate that LEAs must comply with all evaluation procedures which OE may establish and must participate, if requested by OE, in any periodic evaluations of the Follow Through program. The regulations do not provide for self-evaluation which, in our opinion, is an essential part of project management and which could help eliminate program weaknesses of the type noted in our review.

On January 1, 1973, HEW's Office of Child Development issued performance standards to be used in administering and carrying out the Head Start program, which provides the same kinds of services and activities as Follow Through. In general the performance standards, issued as part of the "Head Start Policy Manual," pertain to the methods and processes used by Head Start grantees to meet the needs of children. The standards recognize that programs and approaches should and do vary from community to community. However, Head Start policy requires that, no matter what approach is followed in a local program, the standards constitute the minimum requirements that must be met by the grantee as a condition of Federal funding. On January 31, 1975, HEW gave notice in the Federal Register that it proposed to issue the Head Start performance standards as regulations. These regulations became effective on July 1, 1975.

On February 1, 1975, the Office of Child Development also issued, as part of the "Head Start Policy Manual," a self-assessment/validation instrument for grantee use in conducting an annual assessment of their activities to insure that the performance standards are being met. The instrument will also be used by the Office of Child Development to validate grantee evaluations.

OE CHANGES AND OUR SUGGESTIONS FOR MORE EFFECTIVE MONITORING

An effective monitoring system is one in which program activities are systematically reviewed to determine whether

they are being conducted as planned. If deficiencies occur, the system should provide for identifying causes and recommending solutions, something that, at the time of our site-work, OE's monitoring system did not effectively do. A need existed to increase project performance and improve project recordkeeping. In addition, all projects reviewed, to some extent, either did not meet or could not prove that they had met program requirements pertaining to the source, use, and control of funds.

Later, OE did improve its Follow Through monitoring system but additional improvements in the feedback of monitoring information still can be made.

OE's monitoring system

OE's program for monitoring Follow Through projects was not well defined. However, OE officials said nearly all monitoring of noninstructional services and activities was done by OE project officers and with the occasional assistance of a consulting firm contracted by OE to provide technical assistance to projects.

Before November 1971 OE had assigned a project officer to each project. Each officer was responsible for many projects because the number of projects exceeded the number of officers by more than 20 to 1. The project officers' duties included approving project applications, providing technical assistance, monitoring project performance, and monitoring the activities of program sponsors and the consulting firm personnel (general consultants). Although project officers tried to visit each assigned project annually, it was not always done. During their visits, the officers met with project personnel and parents to discuss project operations.

To assist its project officers in their monitoring efforts, OE assigned to each project a general consultant whose primary function was to visit projects each month to provide technical assistance to help the project assess its strength and weaknesses. The results of their visits were reported to the OE project officer, the project's sponsor, and the local Follow Through staff. Our review of the consultants' reports for the projects we reviewed showed an average of 3.1 visits to the projects in calendar year 1971 and 4.4 visits in 1972.

OE's monitoring changes

From November 1971 to March 1972, OE changed its monitoring system by reorganizing project officer assignments and by providing for a desk audit and a team review at the project site. The project officers were organized into five

area teams, consisting of one or two senior and junior officers and a secretary, with a senior officer as team leader. Each team was responsible for from 29 to 43 projects, depending on the size of its geographical region.

The teams are to perform an annual desk audit of each project consisting of answering questions in a standard review form concerning the various components of the project's Follow Through program. Information is to be obtained primarily from the project's most recent application for funds.

In addition, OE makes 3- to 4-day onsite team reviews of projects. The review group usually consists of a representative from the OE area team, a general consultant, and an HEW regional program specialist. 1/ The group uses a standard review form like the desk audit review form. Information is to be obtained from observations of project activities, interviews with Follow Through staff and parents, and project reports and records. According to an OE official, between one-third and one-half of all Follow Through projects are reviewed each year. He said that in school year 1971-72, OE reviewed about 80 of the 178 existing projects.

We believe that these monitoring changes, especially the use of standard review forms, should help improve project monitoring. The desk audits give OE assurance that projects have adequate plans for each component, and the onsite reviews provide feedback data on how well the plans are working.

Progress and general consultant reports could be made more useful

OE's monitoring system could be further strengthened. Periodically LEAs are required to submit reports to OE on their progress and, as previously mentioned, the general consultants must report the results of their project visits. We examined a number of these reports submitted to OE on the projects reviewed and noted that they were neither uniform nor developed with a view toward improving program operations.

1/A regional program specialist provides various field services to State educational agencies and LEAs. He devotes his time to programs administered under title I of the Elementary and Secondary Education Act and to Follow Through and is available to provide field support to them and to help OE headquarters officials fulfill their management responsibilities.

LEA reports

The grant terms and conditions require LEAs to submit an interim and a final progress report to OE covering the grant period. However, OE gave no written instructions to LEAs on the format and content for these reports until October 1973.

The progress reports we reviewed were narrative descriptions supported by some statistics of what the projects did during the grant period to deliver required services. The reports, which varied in form and content, did not cover all areas of project performance and generally did not identify project goals or, as an alternative, present comparative statistics from the preceding year to give OE management some indication of the adequacy of project accomplishments. They also contained no conclusions concerning any necessity for program improvements or corrective action.

On September 19, 1973, HEW published revised regulations on grants administration which apply to all HEW grant programs. They require grantees to submit periodic performance reports which will include, to the extent appropriate, a comparison of actual accomplishments with goals established for the period and, if applicable, the reasons goals were not met. However, the regulations do not require grantees to report their conclusions concerning the necessity for program improvements or corrective action.

Consultant reports

The general consultant reports, according to the consultants' manual, are to include information on problems, program development, areas in which consultation was and should be given, and recommendations made to projects.

The consultant reports we reviewed, like the progress reports, varied in form and content. Although they contained the general information described in the consultants' manual, they usually did not identify specific weaknesses and probable causes. Such information should be included in the consultants' reports.

The reports did not normally indicate whether project directors concurred in consultant recommendations, what project staffs planned to do to implement recommendations, or whether consultants followed up on recommendations cited in earlier reports to determine whether they had been implemented. This type of information would help insure that needed project improvements are being made.

CONCLUSIONS

The Follow Through projects reviewed generally had provided for the noninstructural services and activities described in the program guidelines, such as organizing activities for and employing parents, providing for policy advisory committees, making home contacts, giving medical and dental examinations, providing free lunches to needy children, and soliciting and using community resources. However, administration of these services and activities needed improvement.

A need to increase services and activities and to obtain closer compliance with program requirements was evident to some degree at all projects. A higher level of services among projects was needed to maximize the potential for alleviating the effects of poverty, and a more uniform level was needed to provide greater assurance that differences among projects in educational attainment were not due in part to differences in the level of services.

Project administration needed to be improved. OE should (1) define, to the extent practicable, the level of performance grantees should strive to achieve in each service component, (2) provide guidance on the type of records needed to document performance, and (3) require grantees to formally evaluate their projects. The regulations do not contain performance standards or require self-evaluation. Rather, they increase the need for performance standards because they make project refunding dependent on the extent to which projects provide required services and activities.

Although OE strengthened its project monitoring during our review, the feedback of information to OE still could be improved. If projects and consultants were required to include in their reports the information discussed in this chapter and to achieve greater uniformity in the form and content of their reports, OE could better monitor projects. Project officers could use the additional information to furnish technical assistance to projects. If the reports were more uniform, OE could periodically summarize the results to determine weaknesses common to many projects as well as examples of exemplary performance.

RECOMMENDATIONS TO THE SECRETARY OF HEW

We recommend that the Secretary direct OE to:

--Establish, to the extent practicable, performance standards for each service component and require LEAs to evaluate their progress toward meeting these standards.

--Develop and disseminate comprehensive guidance to LEAs on a recordkeeping system, including the type of records needed to document performance and provide feedback on program results.

--Develop and disseminate specific guidance to LEAs and consultants on the information that should be included in their reports to OE and on the format and content of these reports.

--Develop, in the early implementation stage of future experiments, regulations and guidelines concerning project administration and monitoring.

AGENCY COMMENTS

HEW concurred in our recommendations and said it had taken or planned to take the following actions:

--OE has developed a Comprehensive Health Service Plan survey which includes all the noninstructional Follow Through components. The survey is a two-part effort in questionnaire form. Part one, which has been approved by the Office of Management and Budget, is a planning questionnaire and will be disseminated before the beginning of the school year. It solicits planning information concerning services to be provided to Follow Through funded children in the school year. It can also be used by the projects for purposes of technical assistance by suggesting resources and activities useful in delivering comprehensive health services.

Part two, which is currently awaiting Office of Management and Budget approval, is an end-of-year report. All Follow Through projects will be required to complete this report which summarizes the services actually provided to the children. The survey will be a definite means of assuring self-evaluation by the projects in terms of the service components offered in the program.

--The Comprehensive Health Services Plan survey will, to some extent, provide guidance to LEAs on a recordkeeping system. In addition, OE staff members, during their various monitoring visits, will provide technical assistance to LEAs on the types of records needed to document program performance.

--OE has developed a reporting form for use by Follow Through consultants which provides for additional information and uniformity in the presentation and content of the report. Also, the Office of Management and Budget recently approved a form which Follow Through grantees must use in indicating performance progress. The format and content of the report are specific and should assist the program in obtaining information on a consistent basis. The form has been mailed to all Follow Through grantees.

--HEW will develop, in the early implementation stage of future experimental programs, regulations and guidelines concerning project administration and monitoring.

We reviewed the Comprehensive Health Services Planning Questionnaire and believe it will provide OE with excellent planning information concerning what services will be or have been provided to Follow Through children. However, it does not constitute performance standards because there are no requirements placed on the grantees to provide the services enumerated. We believe OE should use the information obtained from the questionnaire to establish, to the extent practicable, performance standards which projects must meet to obtain refunding and which also could be used for self-evaluation.

We also reviewed the consultant and grantee performance reporting forms and believe that the consultant report does not fully implement our recommendation. The report does not solicit information on whether project directors concurred in consultant recommendations, what project staffs planned to do to implement recommendations, or whether consultants followed up on recommendations cited in earlier reports to determine whether they had been implemented. We believe this type of information should be included to help OE better monitor projects.

CHAPTER 4

NEED FOR BETTER ADMINISTRATION OF ELIGIBILITY REQUIREMENTS

The Economic Opportunity Act, which established Follow Through, states that the program is to focus primarily upon children previously enrolled in Head Start or a similar program. In general, the projects reviewed served enough children from low-income families but not enough children with the required preschool experience.

Inadequate project records prevented us from determining the exact enrollment characteristics of each project reviewed. In addition, OE did not have data on the actual enrollment at Follow Through projects and lacked adequate control over project compliance with eligibility requirements because it:

--Furnished criteria to LEAs concerning the number and type of children to be enrolled, which differed from the criteria in the May 1969 memorandum of understanding between the Office of Economic Opportunity and HEW.

--Did not furnish LEAs formal guidance on the type of data to be kept to demonstrate compliance with eligibility requirements or require LEAs to report periodically actual enrollment data.

--Exempted LEAs from the preschool eligibility requirement without documenting its reasons.

ELIGIBILITY CRITERIA DIFFERENCES

The May 1969 memorandum of understanding requires that, with rare exceptions, at least 50 percent of the children participating in each Follow Through grade have preschool experience, preferably a full year, and come from families whose incomes meet Head Start income eligibility criteria at the time of enrollment in Head Start. However, OE's draft program manual, dated February 1969, provided that, with rare exceptions, at least one-half of the children

from low-income families 1/ in each Follow Through project have a full year of Head Start or comparable preschool experience. According to OE officials, the projects received the manual criteria but not the memorandum criteria.

The differences between the two criteria are that (1) the memorandum specifies a minimum percentage of children from low-income families that projects must serve, whereas the manual contained no specification and (2) the memorandum provides for more children with preschool experience at each project than did the manual, except when all the children enrolled in a project are from low-income families.

To illustrate the differences, one project we reviewed enrolled 306 children in school year 1971-72. On the basis of the memorandum, at least 50 percent, or 153, of the 306 children should have been from low-income families and have had some preschool experience, preferably a full year. On the basis of the program manual criteria, the number of children required to have had preschool experience would be based solely on the low-income enrollment. For example, if 240 of the 306 children were from low-income families, at least 50 percent, or 120, of them must have had a full year of qualifying preschool experience.

Because the criteria were inconsistent, we asked OE program officials, at the time of our project reviews, which criteria were appropriate. The officials said that, although they had not previously recognized the conflict in the criteria, OE has required, except in rare instances, that 50 percent of a project's enrollment consist of children from low-income families who have had a full year of qualifying preschool experience. They said that OE wanted as many children as possible from full-year Head Start projects enrolled in Follow Through because program funding was limited but permitted some projects to count summer preschool experience in meeting this requirement.

The memorandum of understanding criterion is supported in the final regulations developed for the program and

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1/According to the program manual, a family was considered low-income if (1) it was on welfare or (2) its income in relation to family size was below the Office of Economic Opportunity poverty guidelines at the time a child from the family entered preschool or Follow Through. For example, in December 1971 a family of four would have been considered low-income for Follow Through if its annual income was under $3,800.

published in the Federal Register on April 21, 1975. These regulations state that:

> "At least 50 percent of the children in each entering class shall be children who have previously participated in a full-year Head Start or similar quality preschool program and who were low-income children at the time of enrollment in such preschool program; except that the Commissioner may reduce this percentage requirement in special cases where he determines that its enforcement would prevent the most effective use of Follow Through funds * * *."

Did project enrollments meet the criteria?

To determine the eligibility characteristics of project enrollees, we selected at random two groups of children at each project for comparison. The first group represented children enrolled during school year 1970-71, and the second group represented the 1971-72 enrollment. We selected at least 100 children for each group, but at 2 projects we reviewed the entire enrollment for both school years.

For each child sampled, we attempted to determine from available records (1) the type and length of the child's preschool experience, (2) annual family income and the period during which this income was earned, (3) family size, and (4) family welfare status. Our examination included nonproject records, such as attendance rolls of local Head Start centers and applications for free lunches under the Department of Agriculture's National School Lunch Program.

Our sample results from eight of the nine projects are shown in the following three charts. The odd-numbered samples are for school year 1970-71, and the even for 1971-72. One project was not included because we could not reconcile our statistics with those claimed by the project.

The charts show that 7 of the 8 projects served enough children from low-income families (chart 1) but that the preschool characteristics of their enrollments were

--below that intended by the memorandum of understanding as interpreted by OE in all but 1 of the 15 samples for which records were available (chart 2) and

--below the manual criteria in 5 of the 15 samples for which records were available (chart 3).

CHART 1
CHILDREN FROM LOW-INCOME FAMILIES

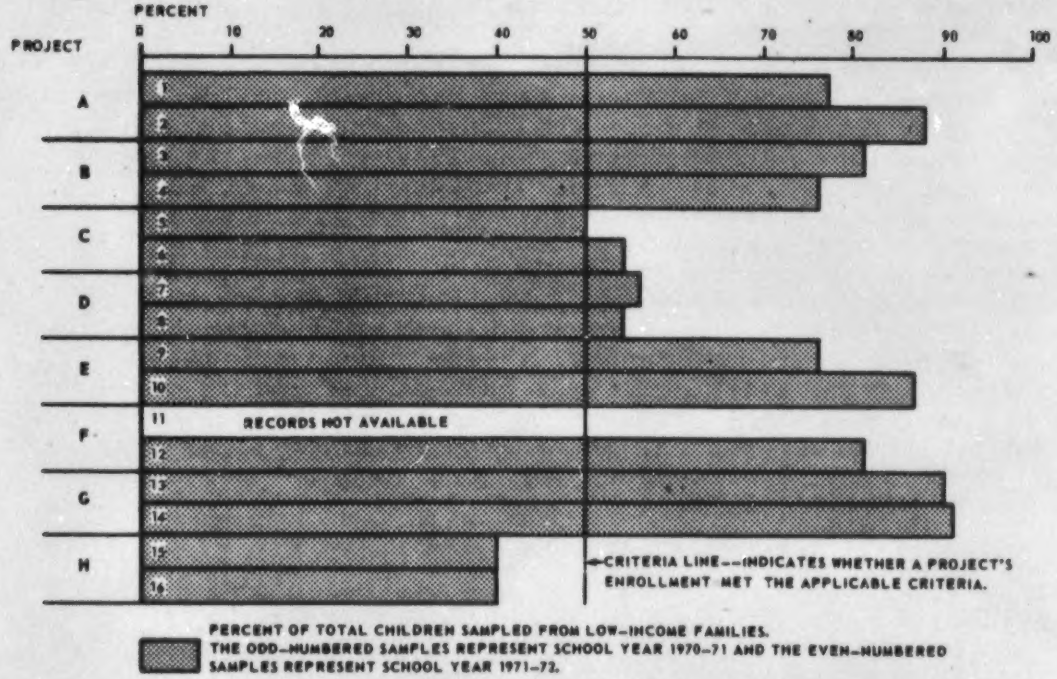


CHART 2
MEMORANDUM OF UNDERSTANDING CRITERIA

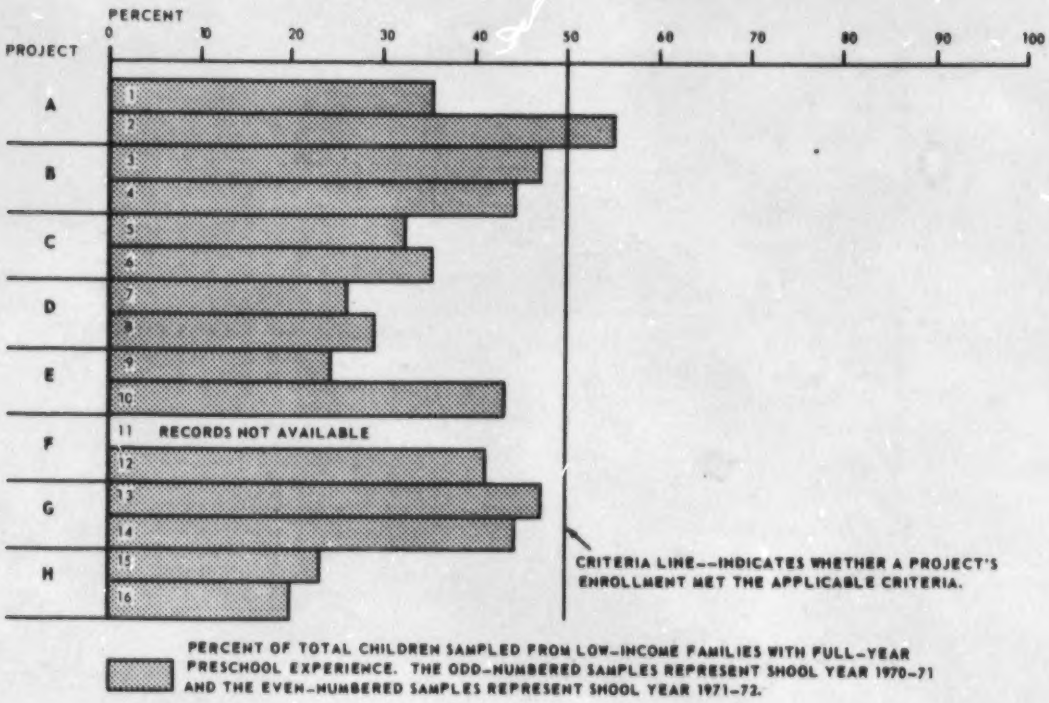
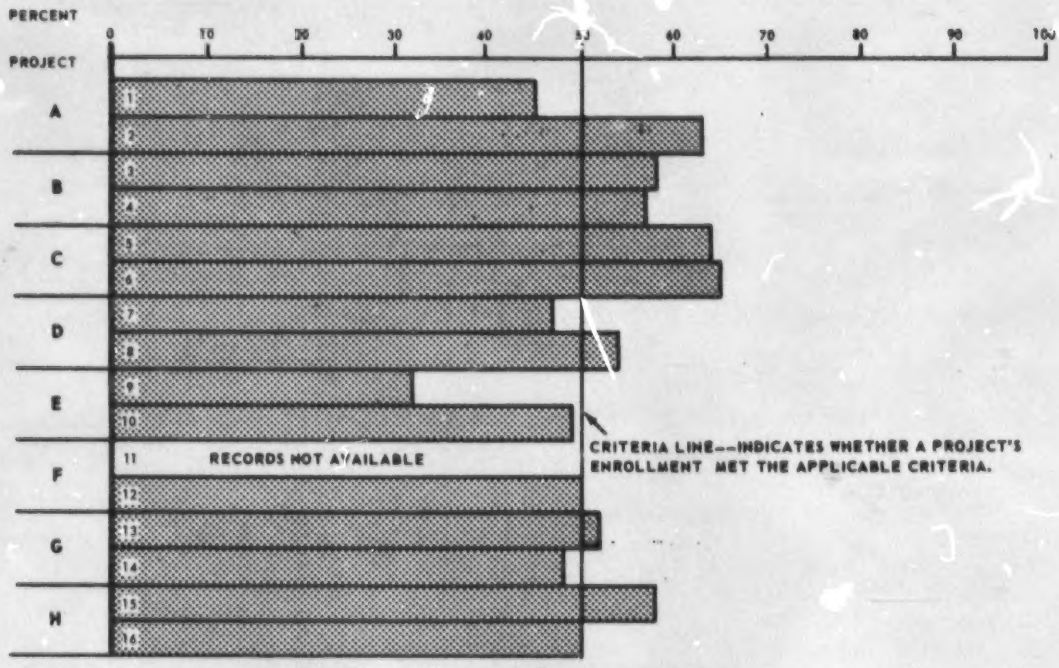


CHART 3
PROGRAM MANUAL CRITERIA



Because of inadequate records, we could not determine the income status of about 13 percent of the children sampled and the preschool status of about 8 percent.

Regarding the low proportion of children from low-income families who had a full year of preschool experience, OE program officials told us that the following factors influenced the number of full-year preschool children who could attend Follow Through:

1. Many Head Start projects in the South, where 10 of our 16 samples were taken, were summer projects and were in areas not having the highest concentrations of low-income families, whereas Follow Through tried to establish its projects in the most poverty-stricken areas.

2. Head Start consolidated projects in many parts of the Nation, causing a reduction in Head Start enrollments in some Follow Through project areas.

3. Many Southern school systems were implementing desegregation plans, causing dispersion of eligible children.

4. Follow Through lost some students through attrition.

The officials explained that support was not withdrawn from projects affected by these factors because such action would have disrupted the Follow Through experiment.

ADEQUACY OF PROJECT ELIGIBILITY RECORDS AND FEEDBACK OF ELIGIBILITY DATA TO OE

OE did not require projects to keep enrollment records or furnish them formal guidance on recordkeeping procedures. OE also did not require periodic reports of actual enrollment data. In addition, some children's family income status had been improperly determined. For example, the project with the highest incidence of improper determinations had classified 153 children in school year 1970-71 and 223 children the following school year as coming from low-income families. From a review of the enrollment data for all children in the project, we determined, and the project director concurred, that 37 and 70 children, respectively, had been erroneously classified as from low-income families and 29 and 12 children, just as erroneously, had been classified as non-low-income. The number of improper classifications varied among the projects from none to many. One project made no attempt to classify children by family income status and another did not classify its children until the fourth year of the program.

Most of the observed procedural weaknesses were due to either the enrollment or other eligibility forms not being completely filled out or their design not providing all the information needed to determine whether a child was from the target population. The poorly designed forms generally lacked information on length and type of preschool experience and family welfare status. A family on welfare automatically qualified for the full range of Follow Through services.

OE program officials told us in September 1973 that they cannot prescribe uniform procedures for collecting enrollment data because the collection of personal information is highly sensitive and generates strong concerns about invasion of privacy. They said, however, that they plan to disseminate guidance to projects on the format for recording enrollment data.

OE officials also said they plan to develop a procedure to collect actual enrollment data from the projects. As of April 1974, almost all OE's information on the number and type of children enrolled in Follow Through was based on estimates included in the project applications for funds. In October 1972 OE did make a one-time request of projects for actual enrollment data. Our analysis of the information submitted to OE showed that 82 percent of the children enrolled in Follow Through were from low-income families. OE did not request information on how many children attended full-year preschool programs.

In our opinion, OE's plans to provide guidance to projects and to collect actual enrollment data are needed to insure that the program's target population is served.

WAIVER OF PRESCHOOL REQUIREMENT

According to OE program officials, waivers were made in the form of their recommendation to an HEW contracting officer that a project be funded. Thus, in those instances where a waiver was granted, the program requirements were waived in favor of the provisions in the application. OE exempted several LEAs from meeting the Follow Through preschool requirement but did not document the reasons.

Of the 18 approved applications we reviewed for school years 1970-71 and 1971-72, 5 showed that the planned enrollment of children from low-income families with any preschool experience at all was below 50 percent of the total enrollment, as required. At our request, an OE program official identified 19 projects in school year 1972-73 with projected Head Start enrollments below 50 percent of the projected total enrollments.

We could not determine whether the reasons for the waivers of the preschool requirement were valid because they were not documented. OE program officials agreed that such documentation should have been required; that in the early years Follow Through's staff devoted its efforts to resolving complex issues involved in starting an innovative program, and that recordkeeping was not given high priority. The officials felt that although a written record was not made, each application was reviewed in depth and waivers of program requirements were thoroughly discussed in face-to-face negotiations with project staff.

CONCLUSIONS

OE's administration of project compliance with eligibility requirements could be improved to insure that the intended target population is served. The actual number of eligible children in Follow Through could not be accurately determined because of the poor quality of project eligibility records and the lack of a procedure requiring periodic eligibility reports from the projects.

On the basis of our sample results and OE data, the projects enrolled enough children from low-income families to meet the program criteria, but many fell short of the goal of serving children from full-year Head Start projects, partially because OE waived this requirement. OE's reasons may have been valid, but documentation was not available to show the alternatives, if any, to granting waivers.

RECOMMENDATIONS TO THE SECRETARY OF HEW

We recommend that the Secretary direct OE to:

--Provide guidance to LEAs on the format of eligibility records and require them to periodically report actual enrollment data, as planned.

--Document reasons for exempting LEAs from program eligibility requirements.

AGENCY COMMENTS

HEW concurred in our recommendations and said:

--OE will begin developing a format which LEAs could use to document the eligibility of children and will attempt to obtain Office of Management and Budget approval for a periodic report of actual enrollment.

--OE will take steps to assure documentation in those instances, where, for justifiable reasons, Follow Through program regulation requirements are waived.

APPENDIX I

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20201

JUL 28 1975

Mr. Gregory J. Ahart
Director, Manpower and
Welfare Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Ahart:

The Secretary asked that I respond to your request for our comments on your draft report to the Congress entitled, "Follow Through: Lessons Learned From its Evaluation and Opportunities to Improve its Administration". They are enclosed.

We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,

John D. Young
Assistant Secretary, Comptroller

Enclosure

Comments of the Department of Health, Education, and Welfare on the Comptroller General's Report to the Congress Entitled, "Follow Through: Lessons Learned From its Evaluation and Opportunities to Improve Its Administration"

GAO Recommendation

Develop greater safeguards to insure that future experimental programs are not designed apart from evaluation to maximize the degree to which experimental results will be statistically reliable.

Department Comment

We concur with the recommendation and will try to insure that legislation and regulations for future experimental programs are consonant with strong evaluation designs by requiring random assignment of projects to school districts, schools, classrooms, etc., and requiring school districts to establish and maintain comparable control groups or schools. The Office of Education will formally advise all program offices of the importance of the making evaluation an integral part of experimental programs.

GAO Recommendation

Translate the problems encountered during the Follow Through experiment into criteria for designing and administering future experiments, including, among other things, criteria to prevent massive data collection on program results before the program's goals and objectives are properly defined.

Department Comment

We agree. The experience of Follow Through re-emphasizes the need for planning prior to implementation of new program designs or major change in basic program thrust. Although OE does not frequently undertake experiments like Follow Through, we recognize that some of the Follow Through experience is pertinent to other program evaluations. We now have a centralized OE evaluation staff responsible for developing evaluation designs based upon program objectives so as to prevent unnecessary data collection. This staff is cognizant of the problems encountered and will to the extent possible incorporate this recommendation in the overall evaluation designs.

GAO Recommendation

Establish, to the extent practicable, performance standards for each service component and require LEAs to evaluate their progress toward meeting these standards.

Department Comment

We agree with this recommendation, and to some extent, this recommendation has been implemented. OE has developed a handbook entitled, "Handbook on Performance Objectives, Title I, Elementary and Secondary Education Act of 1965" and Follow Through is included as one of the programs for which this handbook would be useful. Also, OE has developed a Comprehensive Health Service Plan survey which includes all Follow Through components except the instructional related component. This survey is a two part effort and is in the form of a questionnaire. Part one, "Follow Through Comprehensive Health Services Planning Questionnaire" has been approved by OMB and will be disseminated prior to the beginning of the school year. It solicits planning information concerning services to be provided to Follow Through funded children in the school year. In addition to summarizing plans for delivery of services the questionnaire can be used by the projects for purposes of technical assistance by suggesting resources or activities which could be useful in the delivery of Comprehensive Health Services. Part two of the survey is an end-of-year report, "Follow Through Comprehensive Health Services End-of-Year Report". It is currently awaiting OMB approval, and is a means of noting project accomplishments for a recently completed school year. All Follow Through projects will be required to complete this report which summarizes the actual services provided for the Follow Through children. This survey will be a definite means of assuring self-evaluation by the projects in terms of the service components offered in the program.

GAO Recommendation

Develop and disseminate to LEAs comprehensive guidance on a recordkeeping system, including the type of records needed to document performance and provide feedback on program results.

Department Comment

We agree with this recommendation. OE has to some extent accomplished the implementation of this recommendation with the "Comprehensive Health Services Planning Questionnaire", OE Form 4535, and the draft "Follow Through Comprehensive Services End-of-Year Report". To the extent possible, OE Staff members during their various monitoring visits will provide technical assistance to LEAs in the types of records needed to document program performance.

GAO Recommendation

Develop and disseminate specific guidance to LEAs and consultants on the information that should be included in their reports to OE and on the format and content of these reports.

Department Comment

This recommendation has been implemented. OE has developed a reporting form for use by the Follow Through consultants which provides for additional information and uniformity in the presentation and content of the reports as suggested by GAO. Also OMB has recently approved a form which grantees must use in indicating progress in performance of the Follow Through grants. The format and content of the report are specific and should assist the program in obtaining information on a consistent basis. This form has been mailed to all Follow Through grantees.

GAO Recommendation

Develop, in the early implementation stage of future experiments, regulations and guidelines concerning project administration and monitoring.

Department Comment

We agree with the recommendation and it will be implemented in future experimental programs.

GAO Recommendation

Provide guidance to LEAs on the format of eligibility records and require them to periodically report actual enrollment data.

Department Comment

We agree with the recommendation. OE will begin developing a format which local project grantees could use to document the eligibility of children and will again attempt to obtain approval from OMB for the report of actual enrollment periodically.

GAO Recommendation

Document reasons for exempting LEAs from program eligibility requirements.

Department Comment

We agree with this recommendation. OE will take steps to assure documentation in those instances where for justifiable reasons Follow Through program regulations requirements are being waived.

GAO note: The material on the remaining two pages was deleted because it relates to general matters which were considered or incorporated into the final report.

APPENDIX II

PRINCIPAL HEW OFFICIALS RESPONSIBLE FOR THE ACTIVITIES DISCUSSED IN THIS REPORT

	Tenure of office	
	From	To
SECRETARY OF HEALTH, EDUCATION, AND WELFARE:		
David Mathews	Aug. 1975	Present
Caspar W. Weinberger	Feb. 1973	Aug. 1975
Frank C. Carlucci (acting)	Jan. 1973	Feb. 1973
Elliot L. Richardson	June 1970	Jan. 1973
Robert H. Finch	Jan. 1969	June 1970
Wilbur J. Cohen	Mar. 1968	Jan. 1969
John W. Gardner	Aug. 1965	Mar. 1968
ASSISTANT SECRETARY (EDUCATION):		
Virginia Y. Trotter	June 1974	Present
Charles B. Saunders, Jr. (acting)	Nov. 1973	June 1974
Sidney P. Marland, Jr.	Nov. 1972	Nov. 1973
COMMISSIONER OF EDUCATION:		
Terrel H. Bell	June 1974	Present
John R. Ottina	Aug. 1973	June 1974
John R. Ottina (acting)	Nov. 1972	Aug. 1973
Sidney P. Marland, Jr.	Dec. 1970	Nov. 1972
Terrel H. Bell (acting)	June 1970	Dec. 1970
James E. Allen, Jr.	May 1969	June 1970
Peter P. Muirhead (acting)	Jan. 1969	May 1969
Harold Howe II	Jan. 1966	Jan. 1969

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